UNTIED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS EASTERN DIVISION

NATURE ISLAND INVESTMENT)
COMPANY, LTD.,)
Plaintiff,) C.A. No. 05-10377-GAO
v.) MOTION TO) ADMIT JOHN J. LEE
CDC GLOBELEQ,) PRO HAC VICE
Defendants.)))

I, Kurt B. Gerstner, a member of the bar of this court and counsel for the defendant CDC GLobeleq ("CDC"), hereby move pursuant to Local Rule 83.5.3(b) for the admission of Attorney John J. Lee *pro hac vice*. Attorney Lee is a member of the law firm Bainton McCarthy LLC, 26 Broadway, Suite 2400, New York, New York 10004.

In support of this motion, and as set forth in the certificate attached hereto as Exhibit A, the undersigned states as follows:

- 1. John J. Lee is admitted to practice law in the United States Court of Appeals for the Second Circuit, the United States Court of Appeals for the Sixth Circuit, the United States Court of Appeals for the Eleventh Circuit, the United States District Court for the Eastern District of New York, the United States District Court for the Southern District of New York, and the United States District Court for the Western District of Michigan, as well as in the highest court of the State of New York.
- 2. Attorney John J. Lee is a member of the bar in good standing in every jurisdiction where he has been admitted to practice.

- 3. There are no disciplinary proceedings pending against Attorney John J. Lee in any jurisdiction where he is admitted to practice.
- 4. Attorney Lee is familiar with the Local Rules of the United States District Court for the District of Massachusetts.
- 5. A member in good standing of this Court, Kurt B. Gerstner of Campbell Campbell Edwards & Conroy, P.C., will serve as local counsel and assist Attorney Lee with this matter.
 - 6. Kurt B. Gerstner has filed an answer on behalf of CDC in this matter.

WHEREFORE, this Court should permit Attorney John J. Lee to appear *pro hac vice* on behalf of CDC for the duration of this lawsuit.

CDC GLOBELEQ

By its Attorneys,

CAMPBELL CAMPBELL EDWARDS & CONROY PROFESSIONAL CORPORATION

Kurt B. Gerstner (BBO# 1900130)

Christopher R. Conroy (BBO# 661155)

One Constitutional Plaza

Boston, MA 02129

(617) 241-3000

LR 7.1 CERTIFICATION

I, Kurt Gerstner, certify that the defendant has made numerous attempts to try and contact plaintiff's counsel seeking his assent to this motion, however, has been unable to reach him.

Kurt B. Gerstner

CERTIFICATE OF SERVICE

I, Kurt B. Gerstner, of Campbell Edwards & Conroy, Professional Corporation, attorney for CDC Globeleq, hereby certify that on November 23, 2005, a true copy of the above document was served upon counsel for Plaintiff Nature Island Investment Company, Ltd. via the Court's ECF system.

EXHIBIT A

UNTIED STATES DISTRICT COURT **DISTRICT OF MASSACHUSETTS EASTERN DIVISION**

NATURE ISLAND INVESTMENT COMPANY, LTD.,)))
Plaintiff,) C.A. No. 05-10377-GAO
v.) CERTIFICATE OF JOHN J. LEE
CDC GLOBELEQ,)
Defendants.)

I, John J. Lee, of full age, make this certificate pursuant to Local Rule 83.5.3(b) of the Local Rules of the United States District Court for the District of Massachusetts.

- 1. I am an attorney at the law firm of Bainton McCarthy LLC, 26 Broadway, Suite 2400, New York, New York 10004.
- 2. I am admitted to practice law in the United States Court of Appeals for the Second Circuit, the United States Court of Appeals for the Sixth Circuit, the United States Court of Appeals for the Eleventh Circuit, the United States District Court for the Eastern District of New York, the United States District Court for the Southern District of New York, and the United States District Court for the Western District of Michigan, as well as in the highest court of the State of New York.
- 3. I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice.

- I have reviewed and am familiar with the Local Rules of the United States District 5. Court for the District of Massachusetts.
- I make this Certificate in support of the motion of Kurt B. Gerstner of Campbell 6. Campbell Edwards & Conroy, P.C., One Constitution Plaza, Boston, MA 02129, a member of the bar of this Court, for an order admitting me pro hac vice to serve with him in this case as cocounsel for defendant CDC Globeleq ("CDC"). Mr. Gerstner has already filed an answer as counsel for CDC in this matter.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 22ND DAY OF NOVEMBER, 2005.

/s/ John J. Lee

John J. Lee Bainton McCarthy LLC 26 Broadway, Suite 2400 New York, NY 10004 (212) 480-3500